

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIAM FRANCIS, JR.,

Plaintiff,

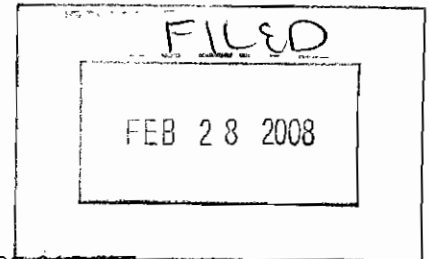
v.

WARDEN THOMAS CARROLL,
CORRECTIONAL MEDICAL SERVICES,
STAN TAYLOR, and JOYCE TALLEY,

Defendants.

C.A. No. 07-015-JJF

TRIAL BY JURY OF
TWELVE DEMANDED



RD scanned

**PLAINTIFF'S FIRST SET OF INTERROGATORIES DIRECTED TO STATE
DEFENDANTS CARROLL, TAYLOR AND TALLEY**

TO: THOMAS CARROLL, STAN TAYLOR and JOYCE TALLEY

Pursuant to Federal Rule Civil Procedure (FRCP) 33, Plaintiff hereby requests that you answer under oath the following Interrogatories within thirty (30) days. You are requested to set out each Interrogatory prior to the answer directed to it. If there is insufficient space to answer any Interrogatory, the remainder of the answer shall follow on supplemental sheets.

The plaintiff in the above-entitled action, pursuant to Rule 33 of the FRCP, requests the following interrogatories be answered jointly, under oath by defendants Thomas Carroll, Stan Taylor and Joyce Talley.

These Interrogatories shall be deemed continuing so as to require supplemental Answers between the time answered and the time of trial.

Pursuant to Fed. R. Civ. P. 34, all documents requested to be produced are to be attached to the Answers to Interrogatories. In the event that the requested documents cannot be attached to the Answers to Interrogatories, you are to provide the direct mail contact information of the agency and official to which Plaintiff may direct a request to view, inspect and copy the documents in question, and the reason why could not be attached to the Answers to Interrogatories.

INTERROGATORIES

1. Defendant Carroll: On what date did you impose a ban on any type or kind of dental floss at the Delaware Correctional Center (DCC), and on what date did the ban imposed by you become effective?

ANSWER:

2. Defendant Carroll: State and enumerate the reasons for which the ban on dental floss at DCC was imposed.

ANSWER:

3. Defendant Carroll: Was the ban on dental floss related to any legitimate penological interest and/or security purpose(s) or objective(s)?

ANSWER:

4. Defendant Carroll: Did you receive approval and authorization to impose a ban on dental floss at DCC from DOC Commissioner Stan Taylor?

ANSWER:

5. Defendant Carroll: Were you aware at the time you imposed the ban on any type or kind of dental floss at DCC that the removal of and prohibition on dental floss would pose serious risks to the oral health and overall physical well-being of the inmate population at DCC? Did you consult a medical/dental professional before imposing the ban and what is the name and last known address of the medical/dental professional or professionals?

ANSWER:

6. Defendant Carroll: Were you aware at the time you imposed the ban on any type or kind of dental floss at DCC that dental floss was being sold in the commissary to the inmate population at the Sussex Correctional Institution (SCI)?

ANSWER:

7. Defendant Taylor: Pursuant to Title 11 Del. Code Section 6536(a) through (e), describe your role, duties, obligations and powers in providing medical and dental services to inmates in all Delaware prisons and in entering into the contract(s) with Correctional Medical Services (CMS), Inc. to provide and offer such services to Delaware inmates.

ANSWER:

8. Defendant Taylor: Were you notified by defendant Carroll that a ban on dental floss was to be imposed at DCC? On what date were you notified? Please

provide a copy of the letter, memorandum, fax, report or e-mail on which the notification was written.

ANSWER:

9. Defendant Taylor: Give names and last known addresses of the chief medical officer (CMO) and other persons who advised and assisted you regarding the dental care policies you implemented between January 1, 2004 and January 31, 2007.

ANSWER:

12. Defendant Taylor: Pursuant to Title 11 Del. Code Section 6536(a), give the total number of Delaware inmates who you authorized to receive treatment at a clinic, medical institution or facility outside the Delaware Correctional Center from 2003 through 2007 and what percentage of the total was taken or escorted to a dental clinic or dental specialist's office for treatment, procedures and/or surgery.

ANSWER:

13. Defendant Taylor: What percentage of the total inmate population in all Delaware prisons, and specifically the Delaware Correctional Center, was diagnosed as having high blood pressure/hypertension and gum and/or periodontal diseases, in 2004 up to and including the date you answered this Interrogatory?

ANSWER:

14. Defendant Talley: What positions of employment did you maintain in the DOC from October 29, 2003 to April 1, 2007 or until the date you resigned from your position with the DOC?

ANSWER:

15. Defendant Talley: Pursuant to Title 11 Del. Code Section 6536(a) through (e), describe your role, duties, obligations and powers with respect to the provision of medical and dental services to inmates confined in Delaware prisons and the contracting of CMS, Inc. to provide and offer such services to Delaware inmates.

By: William Francis, Jr., pro se
William Francis, Jr., *pro se*
Delaware Correctional Center
SBI #264560
1181 Paddock Road
Smyrna, DE 19977

DATED: February **26**, 2008

Certificate of Service

I, William Francis, Jr., hereby certify that I have served a true
And correct cop(ies) of the attached: Plaintiff's First Of
Interrogatories Directed to State Defendants upon the following
parties/person (s):

TO: Ophelia M. Waters,
Deputy Attorney General
Carvel State Office Building
820 N. French Street, 6th Floor
Wilmington, DE 19801

TO: _____

TO: Megan T. Mantzavinos
913 Market Street, #800
Wilmington, DE 19801

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United
States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 26th day of February, 2008

William Francis, Jr. pro se

IM William Francis, Jr.

SBI# 264560 UNIT W-D-22

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977



U.S.M.S.
X-RAY

Joseph J. Farman, Judge
844 King Street, Lock box 18
U.S. District Court
Wilmington, DE

19801

